

Honorable Tana Lin

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

IN RE: PACIFIC MARKET INTERNATIONAL,
LLC, STANLEY TUMBLER LITIGATION

NO. 2:24-cv-00191-TL

**ORDER GRANTING PLAINTIFFS
FRANZETTI, KROHN, AND
BARBU'S UNOPPOSED MOTION
FOR APPOINTMENT OF
INTERIM PUTATIVE CLASS
COUNSEL**

This Document Relates to:
All Actions

WHEREAS, this matter comes before the Court on the Motion for Appointment of Interim Putative Class Counsel filed on behalf of Plaintiffs Mariana Franzetti, Robin Krohn, and Laura Barbu. The Court being fully advised and for good cause shown, the Motion is hereby **GRANTED**.

IT IS HEREBY ORDERED THAT:

A. Appointments to Interim Putative Class Counsel Leadership Structure.

1. Interim Co-Lead Counsel

The Court appoints Alan M. Mansfield (Whatley Kallas LLP), Rebecca Peterson (Lockridge Grindal Nauen PLLP), and Ryan McCarl (Rushing McCarl LLP) as Interim Co-Lead Counsel for all plaintiffs in the above-referenced action (the "Consolidated Action").

//

//

1 Interim Co-Lead Counsel will assume responsibility for the following duties during all phases
2 of the Consolidated Action:

- 3
- 4 a) Coordinating the work of preparing and presenting all of plaintiffs' claims in
5 the Consolidated Action and otherwise coordinating all pleadings and any
6 responses thereto;
- 7 b) Assigning work responsibilities and monitoring the activities of all
8 plaintiffs' counsel in the Consolidated Action in a manner to promote the
9 orderly and efficient conduct of this litigation and to avoid unnecessary
10 duplication and expense;
- 11 c) Calling meetings of counsel for plaintiffs in the Consolidated Action for any
12 appropriate purpose, including coordinating responses and initiating
13 proposals, suggestions, schedules, and any other appropriate matters;
- 14 d) Determining and presenting in briefs, oral argument, or such other fashion as
15 their designee may deem appropriate to the Court and opposing parties the
16 position of the plaintiffs in the Consolidated Action on all matters arising
17 during pretrial and trial proceedings;
- 18 e) Serving as the primary contact for all communications between plaintiffs and
19 defendant in the Consolidated Action, and acting as spokespersons for all
20 plaintiffs *vis-à-vis* defendant and the Court;
- 21 f) Directing and executing on behalf of plaintiffs the filing of all documents
22 with the Court in the Consolidated Action;
- 23 g) Appearing at all court hearings and conferences regarding the Consolidated
24 Action, and speaking for plaintiffs in the Consolidated Action at all such
25 hearings and conferences;
- 26 h) Initiating and conducting discussions and negotiations with counsel for
defendant on all matters, including settlement, in the Consolidated Action;
- i) Negotiating and entering into stipulations with opposing counsel as
necessary for the conduct of the Consolidated Action;
- j) Initiating, coordinating, and conducting all discovery on behalf of plaintiffs
in the Consolidated Action;

- k) Selecting, consulting with, and employing experts for plaintiffs, as necessary for the Consolidated Action;
- l) Assessing plaintiffs' counsel for the costs of the Consolidated Action and establishing and coordinating the use of a litigation cost fund;
- m) Consulting with the Interim Executive Committee as determined to be appropriate and as Interim Co-Lead Counsel shall direct;
- n) Preparing and distributing periodic status reports to the Court and to the parties as ordered;
- o) Developing and recommending practices and procedures pertaining to attorneys' fees and expenses and, on an ongoing basis, monitoring and administering such procedures, and at such time as may be appropriate, apportioning and allocating any fees and expenses that may be awarded by the Court; and
- p) Performing such other duties as are necessary in connection with the prosecution of this Consolidated Action or as may be further directed by the Court in terms of organizing and supervising the efforts of plaintiffs' counsel in a manner to ensure that plaintiffs' pretrial and trial preparation is conducted effectively, efficiently, expeditiously, and economically.

2. Interim Executive Committee

The Court appoints as members of the Interim Executive Committee William Doyle (Doyle APC) , Lori Feldman (George Feldman McDonald, PLLC), and David Goodwin (Gustafson Gluek PLLC) to work with Interim Co-Lead Counsel in this Consolidated Action.

The Interim Executive Committee may assist Interim Co-Lead Counsel with:

- a) Preparing the consolidated class action complaint and any subsequent amendments to the pleadings as may be necessary or ordered by the Court;
- b) Developing and negotiating relevant discovery protocols and stipulations or orders, drafting discovery requests to Defendant, and managing document review;
- c) Managing, implementing, and overseeing third party discovery;
- d) Managing, implementing, and overseeing experts including interviewing experts, preparing experts for and defending experts in depositions and any reports required by the applicable Rules, and preparing for and taking depositions of opposing counsel's experts;

- 1 e) Researching legal issues, preparing motions, and responding to motions; and
2 f) All other responsibilities as may determined to be appropriate by Interim Co-
3 Lead Counsel or as ordered by the Court and as Interim Co-Lead Counsel shall
4 direct.

5 **3. Interim Liaison Counsel**

6 The Court appoints as Interim Liaison Counsel Jason Dennett (Tousley Brain Stephens PLLC)
7 and Brendan Donckers (Breskin Johnson & Townsend PLLC) and to act as an intermediary
8 with the Court for receiving and initiating communications with the Court and the Clerk of the
9 Court (including receiving orders, notices, correspondence, and telephone calls) and dispensing
10 the content of such communications among plaintiffs' counsel in the Consolidated Action.

11 **B. Additional Matters**

12 **1. Settlement Discussions**

13 Any discussions of a settlement of this litigation shall be conducted by Interim Co-Lead
14 Counsel and/or any counsel designated by Interim Co-Lead Counsel.

15 **2. Application of this Order**

16 This Order applies to all actions included in the above-captioned consolidated matters and all
17 subsequently consolidated actions. Interim Co-Lead or Liaison Counsel must serve a copy of
18 this Order promptly by overnight delivery service, electronic mail, or other expeditious
19 electronic means on counsel for plaintiffs in each related action that is filed in, removed or
20 transferred to this Court that is not yet consolidated in this proceeding as soon as practicable
21 after counsel become aware of any such action(s).

22 **IT IS SO ORDERED.**

23 DATED this 16th day of May, 2024.

24 

25 Tana Lin
26 United States District Court Judge